

Dallas A. Verble
Provence, Tiffany N v. United States of America, et al

February 9, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

TIFFANY N. PROVENCE, AS THE PERSONAL REPRESENTATIVE
OF THE ESTATE OF JUAN ANTONIO VILLALOBOS HERNANDEZ,

Plaintiff,

vs.

CASE NO. 2:21-cv-965-RMG

UNITED STATES OF AMERICA,
CROWLEY MARITIME CORPORATION,
CROWLEY GOVERNMENT SERVICES, INC.,
DETYENS SHIPYARD, INC. AND
HIGHTRAK STAFFING, INC. D/B/A
HITRAK STAFFING, INC.,
Defendants.

30(b)(6)

DEPOSITION OF: DETYENS SHIPYARD, INC.
BY: DALLAS A. VERBLE

DATE: February 9, 2022

TIME: 10:04 AM

LOCATION: Detyens Shipyards, Inc.
1670 Dry Dock Avenue, Suite 200
Building 236
North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: TERRI L. BRUSSEAU

1 budget. And any new work that comes along, I do
2 the negotiation and pricing settlement for the new
3 work that comes along.

4 Q. Like a change order?

5 A. Yes, sir.

6 Q. And how long have you been working at
7 Detyens Shipyard?

8 A. About 23 years.

9 Q. All right. And are you directly --
10 like your paycheck, does it come from Detyens
11 Shipyard or does it come from HiTrak Staffing?

12 A. From Detyens Shipyard.

13 Q. Have you ever worked for HiTrak
14 Staffing?

15 A. When I first come to Detyens, everybody
16 comes in a temporary and I was temporary for the
17 30, 60 days, whatever, until I become permanent.

18 Q. So after you initially started with
19 HiTrak, at some point 30 or 60 days later you
20 became a permanent employee of Detyens?

21 A. Yes. Yes, sir.

22 Q. And do you have any role at all with
23 HiTrak or do you interact with the folks at HiTrak
24 in your job?

25 A. No, sir. I don't remember nothing

1 about HiTrak except my paycheck was just different
2 in the beginning until I become permanent.

3 Q. Okay. And have you been a project
4 manager that entire 23 years or did you have other
5 job titles?

6 A. No, I was -- I had other job titles.

7 Q. Can you summarize those for me just
8 generally?

9 A. Well, when I first started here, I was
10 a mechanic on the ship working. And then I was
11 promoted to what they call a lead man. It's just
12 directed the workers on the deck plate. And then I
13 was promoted to the ship supervisor. The ship
14 supervisor manages the work on the ship as a whole
15 as a project.

16 Q. Okay.

17 A. And then I was promoted to project
18 manager, which I already explained.

19 Q. Right. Thank you. And then project
20 manager, how long have you been in that position,
21 roughly?

22 A. Over ten years.

23 Q. Okay. And so as project manager, were
24 you involved in the contract negotiations regarding
25 the LUMMUS, the ship where Mr. Hernandez was

1 all employees, persons and property.

2 Q. Yeah. Right. So what I'm asking you
3 is as the project manager for Detyens, what best
4 efforts did Detyens use -- Detyens use to prevent
5 accidents around lifeboat davit Number 6 on the
6 LUMMUS back in April 3rd of 2019? Just run through
7 all of them.

8 A. Our best effort was we wired it up with
9 steel cable like we've always done. That's the way
10 we've done it. We never had an issue in the past.

11 Q. Okay. Is that the sum total of
12 everything that Detyens did to use its best efforts
13 to make sure this was safely done?

14 MR. HOOD: I'm going to object to the
15 form. Outside the scope of the deposition.

16 MR. YOUNG: Okay. I think he's the
17 contract guy, but...

18 MR. HOOD: You're asking about
19 specific, like compliance with provisions in the
20 contract about overseeing the manner of the work
21 that was done. You can ask him questions. I don't
22 think that's covered by that.

23 MR. YOUNG: Okay. Yeah. Fair enough.

24 MR. HOOD: You've already deposed the
25 safety folks who testified about what was done.